

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

Patti Hidalgo Menders; Scott Mineo;
and Jane Does #1, #2, and #3, on behalf
of themselves and their minor children
R.M.; A.M.; Jane Does #4, #5, and #6;
and John Does #1 and #2.

Plaintiffs,

v.

Loudoun County School Board,

Defendant.

Case No. 1:21-cv-00669

MEMORANDUM IN SUPPORT OF JOINT
MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER

MEMORANDUM IN SUPPORT OF
JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiffs Patti Menders, Scott Mineo, and Jane Doe #2, and Defendant Loudoun County School Board (“School Board”), by counsel, state as follows in support of their Joint Motion for Entry of Agreed Protective Order:

1. The parties anticipate that certain discovery materials to be exchanged in this case, including documents, interrogatory answers, deposition testimony and other discovery, will contain confidential non-public information of a personal or otherwise sensitive nature—including medical, tax, and personnel records—that qualifies for protection under Rule 26 of the Federal Rules of Civil Procedure. In addition, the identities of certain Plaintiffs in this matter are protected by an Order of this Court.
2. The parties agree that the confidentiality of such information should be protected.

3. The parties seek entry of a protective order to expedite the litigation, minimize any disputes over confidentiality, and adequately protect material the parties are willing to voluntarily produce but are entitled to keep confidential.

4. As a result, the parties have agreed to the proposed Agreed Protective Order, attached to the Joint Motion, and request the Court to enter it in this case.

WHEREFORE, based on the foregoing and the agreement of the parties, Plaintiff and Defendants jointly request that this Court grant the Joint Motion and enter the Agreed Protective Order attached thereto.

Date: January 19, 2022

Respectfully Submitted,

/s/ Jeffrey D. Jennings

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2022, I filed the foregoing document with the Court's ECF system, which will automatically send a copy to all counsel of record.

/s/ Jeffrey D. Jennings

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